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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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June 18, 2010

Bill Devereaux
Environmental Affairs Division
Seattle City Light
P.O. Box 34023
Seattle, WA 98124-4023

Re: Interim Action – Schedule for Removal of Contaminated Soils at the Georgetown Steam Plant
North Boeing Field/Georgetown Steam Plant Agreed Order No. DE 5685

Dear Mr. Devereaux:

Thank you for your letter of June 11, 2010, regarding phasing of studies and interim actions at the Georgetown Steam Plant (GTSP). Your letter asserts that there is no complete pathway for contaminants from the GTSP into Slip 4. The following facts demonstrate that there is a potential pathway for PCBs in soil on the GTSP to be transported into Slip 4. Soil investigations at the site have identified PCBs in soil at high concentrations along the southwest fence line of the property. Groundwater monitoring by the City of Seattle consistently detected PCBs in groundwater in the southern corner of the property. Monitoring of groundwater table elevations at the site indicate that the groundwater gradient is generally to the south and southwest. There is no subsurface barrier preventing the flow of PCBs in groundwater on GTSP property into the North Boeing Field (NBF) property. PCBs were recently detected in groundwater entering a catch basin immediately south of the GTSP property. PCBs have been detected during base flow monitoring of the storm drain system in the northern portion of North Boeing Field. Base flow from this area is currently being discharged to Slip 4.

Your letter indicates that the earliest an interim action on the Georgetown Steam Plant property could occur is June 2011. This schedule is unacceptable to Ecology. Boeing recently completed soil remediation work on NBF Boeing in the vicinity of the 3-322 Building. The extent of soil removed was much larger than anticipated. Even with a more detailed subsurface investigation at the GTSP property, is it likely that the extent of contaminated soil removal will be driven more by soil confirmation analyses in the field rather than by a detailed site investigation. Existing contaminated soil data in the vicinity of the southwest fence line of the GTSP property indicate that soils in this area must be removed. Removal of contaminated soils from this area will likely be consistent with a final remedy for the property.

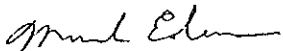
The City of Seattle must submit a revised schedule and plans for beginning soil removal activities in the vicinity of the southwest fence line of the GTSP property during the 2010 construction season. These plans must include the use of a laboratory that can provide contaminated soil data with a rapid turnaround. Use of a laboratory that can provide quick turnaround for sample analysis in combination with a remedial contractor will allow this work to proceed rapidly.

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As I discussed in our meeting on June 17, 2010, you may either agree this decision or dispute it. Under Paragraph VIII – G. of the Agreed Order, you have fourteen (14) days within which to notify me in writing that you object to the decision. We intend to resolve any dispute expeditiously.

If you have any questions, please contact me at 425-649-7070.

Sincerely,



Mark Edens,
Project Manager

cc: Steven Tochko, Boeing
Brian Anderson, Boeing
Carl Bach, Boeing
Shelia Eckman, EPA
Karen Keeley, EPA
Peter Dumaliang, King County International Airport
Jennie Goldberg, City of Seattle
Scott Downey, EPA
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